

DISTRICT OF NEW JERSEY
UNITED STATES BANKRUPTCY COURT

Caption in Compliance with D.N.J. LBR 9004-2(c)

Joseph G. Devine, Jr., Esq. (ID #031072011)

SCHILLER, KNAPP,

LEFKOWITZ & HERTZEL, LLP

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Attorneys for Creditor, TD Auto Finance LLC

In Re:

MICHAEL RAMOS AND
DAPHNE Y. RAMOS

Debtors.

Lead Case No.: 19-17748-KCF

Adv. No: 19-02048-KCF

Judge: Hon. Kathryn C. Ferguson

Chapter: 7

TD Auto Finance LLC

Plaintiff

v.

DAPHNE Y. RAMOS

Defendant

**APPLICATION FOR THE ENTRY OF A
CONSENT ORDER GRANTING RELIEF
FROM THE AUTOMATIC STAY**

Joseph G. Devine, Jr., Esq., attorney for Creditor, TD Auto Finance LLC, respectfully represents to the Court as follows:

1. I am an attorney-at-law of the State of New Jersey and associated with the firm of SCHILLER, KNAPP, LEFKOWITZ & HERTZEL LLP, attorneys for Creditor in the above-captioned matter.

2. The Debtor has agreed to allow TD Auto Finance LLC to recover and liquidate the vehicle described as one (1) 2017 Mercedes Benz GLS Class (V.I.N. 4JGDF6EEXHA959141).

3. The parties have agreed that the automatic stay instituted upon the filing of Petition shall not apply to any action by the Creditor to recover possession and dispose of its collateral; namely one (1) 2017 Mercedes Benz GLS Class (V.I.N. 4JGDF6EXHA959141).

4. Creditor has agreed to withdraw its Adversary Complaint subject to a separate Consent Order to resolve this matter.

5. The Creditor respectfully requests that if the proposed Consent Order herewith meets with Your Honor's approval, that Your Honor execute the Order without any further hearing.

6. I certify that the foregoing statements made by me are true. I am aware that if any of the statements made by me are willfully false, I am subject to punishment.

Respectfully submitted,

/s/ Joseph Devine
Joseph G. Devine, Jr., Esq.
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Date: January 20, 2020